

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
AT WHITE PLAINS**

UNITED STATES OF AMERICA

v.

Docket No. 7:13-CR-00616-VB-3

RIZVE AHMED

MOTION FOR MODIFICATION OF PRETRIAL RELEASE CONDITIONS

The Defendant, Rizve Ahmed, through counsel, moves this Court for a modification of the pretrial release conditions reducing the amount of secured bail from \$200,000 to \$100,000, and in support states:

1. Mr. Ahmed, through his immediate family, has made diligent efforts to raise \$200,000 dollars for bail since the Court granted his request for pretrial release on conditions.
2. Mr. Ahmed has been unable to secure \$200,000 for bail.
3. Mr. Ahmed originally believed his family's home would be worth approximately \$50,000; however, an appraisal has revealed that the home has no equity.
4. Mr. Ahmed has been successful in raising \$100,000 for bail.
5. Mr. Ahmed's immediate family is able to provide \$75,000 for bail, while his uncle can contribute an additional \$25,000 for bail.
6. Mr. Ahmed believes he is currently able to meet all other conditions of release.
7. Mr. Ahmed's status remains unchanged since the previous hearing regarding bail conditions.

8. Based on a telephone conversation with Assistant United States Attorney Ben Allee, the government opposes this motions based on the same factors argued at the bail hearing.

Wherefore, Mr. Ahmed respectfully requests this honorable court modify the terms of his pretrial release to require a \$100,000 secured bail with \$400,000 signature bond in satisfaction of this Court's pretrial release conditions.

Respectfully submitted this 5th day of December 2013.

s/ Bradley L. Henry
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Certificate of Service

I certify that the forgoing document was electronically filed on December 5, 2013. Notice of this filing was sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

s/Bradley L. Henry
Bradley L. Henry